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ATTORNEYS FOR JAMES DONDERO

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE NORTHERN DISTRICT OF TEXAS
 DALLAS DIVISION**

<p>In re:</p> <p>HIGHLAND CAPITAL MANAGEMENT, L.P.</p> <p>Debtor.</p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Chapter 11</p> <p>Case No. 19-34054</p>
<p>UBS SECURITIES LLC AND UBS AG LONDON BRANCH,</p> <p>Plaintiffs,</p> <p>v.</p> <p>HIGHLAND CAPITAL MANAGEMENT, L.P.,</p> <p>Defendant.</p> <p>-----</p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Adversary Proceeding</p> <p>No. 21-03020</p>

JAMES DONDERO’S WITNESS AND EXHIBIT LIST

James Dondero (“Dondero”) hereby files this Witness and Exhibit List with respect to

(i) *UBS’s Motion for an Order Authorizing Alternative Service of Subpoena* [Docket No. 28];

(ii) *Nonparty deponent James Dondero’s Motion for Protective Order* [Docket No. 23]; and the

(iii) *James Dondero’s Motion to Modify Order Granting Leave to File Under Seal* [Docket No. 24] which the Court has set for hearing at 1:30 p.m. (Central Time) on Wednesday, April 28, 2021 (the “Hearing”) in the above-styled adversary proceeding (the “Adversary Proceeding”).

A. Documents that Dondero may use as exhibits:

Exhibit No.	Description	Offered	Objection	Admitted
1	Letter from Andrew B. Clubok of LATHAM & WATKINS LLP to D. Michael Lynn c/o Bonds Ellis Eppich Schafer Jones LLP (the “UBS Letter”) dated March 30, 2021			
2	Letter from John A. Morris of PACHULSKI STANG ZIEHL & JONES LLP to D. Michael Lynn c/o Bonds Ellis Eppich Schafer Jones LLP (the “Debtor’s Letter”) dated March 31, 2021			
3	Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Bankruptcy case (or Adversary Proceeding) (the “Production Subpoena”) dated April 1, 2021			
4	Subpoena to Testify at a Deposition in a Bankruptcy case (or Adversary Proceeding) (the “Deposition Subpoena”) dated April 1, 2021			
5	Notice of Deposition of James Dondero, in Connection with Plaintiffs’ Motion for a Temporary Restraining Order and Preliminary Injunction against Highland Capital Management, L.P. (the “Notice of Deposition”) dated April 1, 2021			
6	Any document or pleading filed in the above-captioned bankruptcy case or adversary proceeding			
7	Any exhibit necessary for impeachment or rebuttal purposes			
8	Any and all documents identified or offered by any other party			

Dondero reserves the right to supplement this Exhibit List should he determine that any other document may be helpful to the trier of fact, whether in his case in chief or rebuttal.

B. Witnesses that Dondero may call to testify:

1. James. P. Seery, Jr., or other representative of the Debtor;
2. A representative of UBS;
3. Any and all other witnesses identified or called by any other party; and
4. Any witness necessary for rebuttal.

Dondero reserves the right to supplement this Witness List should he determine that any other witness may be helpful to the trier of fact, whether in his case in chief or rebuttal.

Dated: April 22, 2021

Respectfully submitted,

/s/ Clay M. Taylor

John Y. Bonds, III

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on April, 22, 2021, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on all parties requesting or consenting to such service in this case.

/s/ Clay M. Taylor

Clay Taylor